

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

January 11, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: IM Telecom, LLC d/b/a Infiniti Mobile; WC Docket No. 11-42
Forbearance Notice from Obligation to Offer Lifeline-Supported Broadband Service

Dear Ms. Dortch:

In accordance with the Public Notice released November 16, 2016 (DA 16-1316), and pursuant to procedures as set forth in the Federal Communication Commission's ("FCC" or the "Commission") *Lifeline Modernization Order*,¹ IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile") hereby provides the Commission with this notice of its intent to avail itself of forbearance from the obligation to offer Lifeline-supported broadband Internet access services ("BIAS") in its designated service area as described herein.

As outlined in the *Lifeline Modernization Order*, the Commission designated BIAS as a Lifeline-supported service.² At the same time, the Commission forbore from requiring Lifeline-only eligible telecommunications carriers ("ETCs") to offer Lifeline-supported BIAS services.³ Beginning December 2, 2016, Lifeline-only ETCs and high-cost recipients are obligated to offer Lifeline-supported BIAS throughout their designated service areas, except to the extent they have elected to avail themselves of forbearance relief from this obligation by filing notice with the Commission within thirty (30) days of receiving their ETC designations or a qualifying change to their high-cost support for a specific area.⁴

As a Lifeline-only ETC on a wireless basis in Oklahoma, Nevada, Wisconsin, Vermont, Maryland, Georgia, and South Carolina, Infiniti Mobile hereby provides the following required information to successfully avail itself from the requirement to offer BIAS:

¹ See *Lifeline and Link Up Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3972, paras. 30-32 (2016) ("*Lifeline Modernization Order*").

² *Id.*

³ *Id.* at 4071-74, paras. 297, 300-308.

⁴ See *id.* at 4072, 4075, paras. 301, 313; see also Lifeline Broadband Provider Designation Public Notice, at n.15.

I. Carrier Name

IM Telecom, LLC d/b/a Infiniti Mobile does not currently have any holding companies, operating companies, or any affiliates; it does not share common ownership with any other legal entity and both operates under and identifies itself using the following fictitious business name: Infiniti Mobile.

However, Infiniti Mobile works closely in association with the following companies—sharing no common ownership—to provide the listed services, respectfully: Whitehouse Wireless, LLC d/b/a WWUSA, which provides employment services; CDM Management, LLC, which handles regulatory matters; and AGVZ Management, LLC, which provides sales, marketing, and inventory services.

II. ETC Designation Information

Infiniti Mobile has been designated, on a wireless basis, as a Lifeline-only ETC in the following jurisdictions:

- a. **Oklahoma** – On July 5, 2012, the Corporation Commission of Oklahoma designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Cause No. PUD 201200045 via its *Final Order*, Order No. 599424.
- b. **Nevada** – On April 4, 2016, the Public Utilities Commission of Nevada designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 16-02022 via its *Order*.
- c. **Wisconsin** – On May 24, 2016, the Public Service Commission of Wisconsin designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 9694-TI-100, via its *Final Decision*, PSC Ref#: 286464. On June 16, 2016, the Public Service Commission of Wisconsin issued a *Correction Order*, PSC Ref#: 287381, in Docket No. 9694-TI-100, correcting a typographic error pursuant to Wis. Stat. § 196.39(4) and did not change the substance of the *Final Decision*.
- d. **Vermont** – On August 5, 2016, the State of Vermont Public Service Board designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 8687 via its *Order*.
- e. **Maryland** – On August 24, 2016, the State of Maryland Public Service Commission designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in ML#s 183297 and 196082 via its *Approval Notice Letter*, TE-11768.
- f. **Georgia** – On November 7, 2016, the Georgia Public Service Commission designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 40193 via its *Order on Application for Designation as an Eligible Telecommunications Carrier*, Document No. 165838.
- g. **South Carolina** – On November 30, 2016, the Public Service Commission of South Carolina designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 2016-279-C via its *Order Approving ETC Status*, Order No. 2016-795.

III. Areas Where Infiniti Mobile Seeks Forbearance

Infiniti Mobile seeks to avail itself of forbearance relief from the requirement to provide BIAS throughout its entire service area wherein it has been designated as an ETC to date only in the following jurisdictions: Vermont, Maryland, and Georgia.

As of the date of this filing, Infiniti Mobile has not yet launched service in said jurisdictions, wherein it seeks to avail itself of forbearance from the obligation to provide BIAS. In the process of coordinating with counsel to craft revised service plans, compliant with the minimum service standards set forth in the FCC's *Lifeline Modernization Order*, for use upon launch of its Lifeline-supported service, Infiniti Mobile acknowledged the need to file the instant request for forbearance from the obligation to offer BIAS in the aforementioned jurisdictions by December 2, 2016.

Please see attached Exhibit 1, which includes a list of Census-recognized geographic areas, specifically counties, for which Infiniti Mobile requests forbearance relief from the obligation to offer BIAS, including associated Federal Information Processing Standards ("FIPS") Codes.

IV. Signature and Contact Information of Authorized Representative

As required, please see attached Exhibit 2, which includes a certification of Trevan Morrow, the Chief Operating Officer of Infiniti Mobile, who can be contacted at 1705 South Baltimore Ave., Tulsa, Oklahoma 74119, or via telephone at (918) 607-7379.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,



Burton F. Peebles, Esq.
Associate Attorney
Lance J.M. Steinhart, P.C.

Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile

cc: Trevan Morrow
USAC

Exhibit 1

Requested Forbearance Service Area

PSC State	County	FIPS Code
GA	BARTOW	13, 015
GA	BIBB	13, 021
GA	BRANTLEY	13, 025
GA	BRYAN	13, 029
GA	BULLOCH	13, 031
GA	CARROLL	13, 045
GA	CHATHAM	13, 051
GA	CHATTAHOOCHEE	13, 053
GA	CLARKE	13, 059
GA	COBB	13, 067
GA	COLUMBIA	13, 037
GA	COOK	13, 075
GA	COWETA	13, 077
GA	CRISP	13, 081
GA	DADE	13, 083
GA	DECATUR	13, 087
GA	DEKALB	13, 089
GA	FORSYTH	13, 117
GA	FULTON	13, 121
GA	GLYNN	13, 127
GA	GORDON	13, 129
GA	GREENE	13, 133
GA	GWINNETT	13, 135
GA	HALL	13, 139
GA	HARALSON	13, 143
GA	HARRIS	13, 145
GA	HART	13, 147
GA	HOUSTON	13, 153
GA	LAMAR	13, 171
GA	LAURENS	13, 175
GA	LEE	13, 177
GA	LIBERTY	13, 179
GA	MCDUFFIE	13, 189
GA	MCINTOSH	13, 191
GA	MONROE	13, 207
GA	MORGAN	13, 211
GA	MUSCOGEE	13, 215
GA	NEWTON	13, 217
GA	OCONEE	13, 219
GA	PEACH	13, 225
GA	PICKENS	13, 227
GA	POLK	13, 233
GA	RICHMOND	13, 245
GA	ROCKDALE	13, 247
GA	SPALDING	13, 255
GA	SUMTER	13, 261

PSC State	County	FIPS Code
GA	TIFT	13, 277
GA	TOOMBS	13, 279
GA	TROUP	13, 285
GA	WALTON	13, 297
GA	WARREN	13, 301
GA	WORTH	13, 321
MD	ALLEGANY	24, 001
MD	ANNE ARUNDEL	24, 003
MD	BALTIMORE	24, 005
MD	CALVERT	24, 009
MD	CAROLINE	24, 011
MD	CARROLL	24, 013
MD	CECIL	24, 015
MD	CHARLES	24, 017
MD	DORCHESTER	24, 019
MD	FREDERICK	24, 021
MD	GARRETT	24, 023
MD	HARFORD	24, 025
MD	HOWARD	24, 027
MD	KENT	24, 029
MD	MONTGOMERY	24, 031
MD	PRINCE GEORGE'S	24, 033
MD	QUEEN ANNE'S	24, 035
MD	ST. MARY'S	24, 037
MD	SOMERSET	24, 039
MD	TALBOT	24, 041
MD	WICOMICO	24, 045
MD	WORCHESTER	24, 047
MD	BALTIMORE CITY	24, 510
VT	ADDISON	50, 001
VT	BENNINGTON	50, 003
VT	CALEDONIA	50, 005
VT	CHITTENDEN	50, 007
VT	ESSEX	50, 009
VT	FRANKLIN	50, 011
VT	GRAND ISLE	50, 013
VT	LAMOILLE	50, 015
VT	ORANGE	50, 017
VT	ORLEANS	50, 019
VT	RUTLAND	50, 021
VT	WASHINGTON	50, 023
VT	WINDHAM	50, 025
VT	WINDSOR	50, 027

Exhibit 2

**Certification of Trevan Morrow, Chief Operating Officer (“COO”) of
IM Telecom, LLC d/b/a Infiniti Mobile**

STATE OF OKLAHOMA

COUNTY OF TULSA

)
)
)

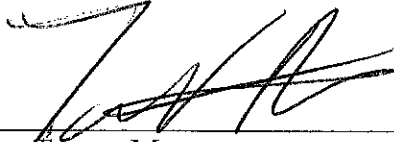
CERTIFICATION

I, Trevan Morrow, hereby state under penalty of perjury as follows:

1. I am Chief Operating Officer of IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile" or the "Petitioner"), an Oklahoma limited liability company with its principal place of business at 1705 South Baltimore Ave., Tulsa, Oklahoma 74119. I may be contacted at the same address.
2. I may also be contacted via telephone at (918) 607-7379.
3. I have read the foregoing Forbearance Notification and confirm the information contained therein to be true and correct to the best of my knowledge.
4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 1-10-17

IM Telecom, LLC d/b/a Infiniti Mobile

By: 
Trevan Morrow
Chief Operating Officer

